

NOV 16 2016
CLERK, U.S. DISTRICT COURT
RICHMOND, VA

IN THE
UNITED STATES DISTRICT COURT OF
ALEXANDRIA VIRGINIA

John Robert Demos, Jr., &
THE SOCIETY OF T.R.U.T.H.
(PLAINTIFFS)

VS

GANNETT CORP INC,
McCLATCHY CO,
New York Times Co,
Tribune Co,
Washington Post Co,
Advance Publications Inc,

(DEFENDANTS)

U.S.D.C. CASE NO: 3:16cv94

"THE ANTI-TRUST CIVIL PROCESS ACT" &
ANTI-TRUST COMPLAINT, PURSUANT
TO, THE 1890 SHERMAN ANTI-TRUST
ACT, THE 1914 CLAYTON ACT, THE 1914
FEDERAL TRADE COMMISSION ACT, THE
NOERR-PENNINGTON DOCTRINE,
15 USCS 1, 1311, 7, 12, 27, 28 USCS 1332,
28 STAT. 570, 365 U.S. 127, 116 U.S. 517,
381 U.S. 657, 384 U.S. 270, 312 U.S. 600,
435 U.S. 389, 173 F. 177, 226 U.S. 61,
419 U.S. 186, 250 U.S. 300, 310 U.S. 150,
577 F. 2d 239, 221 U.S. 1,

TO: THE CLERK OF THE COURT.

COMES NOW THE PLAINTIFFS WHO AVER, AND DEPOSE
THE FOLLOWING UNDER THE PAIN, AND PENALTY OF PERJURY.

A: THAT THE NAMED DEFENDANTS IN THIS COMPLAINT
ARE ENGAGED IN AN UNREASONABLE RESTRAINT OF TRADE,
BY WAY OF A CONSPIRACY, CONTRACT, OR COMBINATION IN
RESTRAINT OF TRADE, OR MONOPOLIZATION, OR ATTEMPT TO
MONOPOLIZE, 554 F.2d 633, 679 F.3d 278, 673 F.3d 430, BY
WAY OF (1) UNITY OF PURPOSE, (2) COMMON DESIGN,
(3) UNDERSTANDING, (4) MEETING OF THE MINDS, (5) SPECIFIC
INTENT, (6) COLLUSION, 602 F.3d 237,

RECEIVED
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CLERK, U.S. DISTRICT COURT
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Argument

I CHARGE, GANNETT CORP, WASHINGTON POST Co,
MECHATECH CORP, NEW YORK TIMES Co,
ADVANCE PUBLICATIONS INC, TRIBUNE Co,

WITH BEING IN VIOLATION OF THE U.S. ANTI-TRUST LAWS, AND
WITH BEING IN VIOLATION OF THE 1890 SHERMAN
ANTI-TRUST ACT.

THE ACTIVITIES OF THE NAMED DEFENDANTS,

POSE A THREAT TO THE FREE MARKET AND RESTRAIN
COMPETITION WHICH IT CANNOT DO.

THE PRACTICES OF,

THE NAMED DEFENDANTS

ARE COLLUSIVE, EXCLUSIONARY, AND MONOPOLISTIC, AND RESTRAIN COMPETITION, WHICH POSES A DANGER OF INCREASED PRICES, REDUCED OUTPUT, QUALITY, AND INNOVATION, IN THE MARKET PLACE, IN VIOLATION OF THE 1914 CLAYTON ACT, AND FEDERAL TRADE COMMISSION ACT, WHICH PROHIBITS EVERY CONTRACT, COMBINATION, OR CONSPIRACY IN RESTRAINT OF INTERSTATE OR FOREIGN TRADE, OR COMMERCE.

THE NAMED DEFENDANTS,
GANNETT CORP,
MC CLATCHIEY CORP,
NEW YORK TIMES CO,
WASHINGTON POST CO,
ADVANCE PUBLICATIONS INC,
TRIBUNE CO,

PRACTICES OF PRICE DISCRIMINATION, TYING ARRANGEMENTS, EXCLUSIVE DEALING, MERGERS, AND INTER-LOCKING DIRECTORATES, CONSTITUTE UNFAIR METHODS OF COMPETITION, AND CONSTITUTE A DANGER TO THE MAINTENANCE OF THE AMERICAN FREE ENTERPRISE SYSTEM.

THE NAMED DEFENDANTS,
GANNETT CORP,
TRIBUNE CO,
WASHINGTON POST CO,
NEW YORK TIMES CO,
MC CLATCHIEY CORP,
ADVANCE PUBLICATIONS INC

System of Vertical & Horizontal Agreements, Mergers,
And Single Firm Activities Directed Toward The
Acquisition And Maintenance Of A Monopoly, Violate
Anti-Trust Law, Against Predatory behavior, In
Restraint Of Trade, To Include Trusts, Holding
Companies, Cartels, And Mergers, And Acquisitions.

The Actions Of The Named Defendants,

Gannett Corp,
McClatchey Corp,
New York Times Co,
Tribune Co,
Washington Post Co,
Advance Publications Inc,

Deflate Economic Opportunity, Stagnate Fair
Consumer Prices, Efficiency, And Political Liberty
Which Leads To Price Fixing.

The Named Defendants

Gannett Corp,
McClatchey Corp,
New York Times Co,
Tribune Co,
Washington Post Co,
Advance Publications Inc.

ECONOMIC CONCENTRATION, DOMINANT MARKET POWER,
IS WRONGFUL CONDUCT, AS OPPOSED TO COMPETITION ON
THE MERITS.

IN THE FIELD OF NEWSPAPER PUBLISHING

THE NAMED DEFENDANTS ARE THE DOMINANT
INDUSTRY INCUMBENTS, WHICH ALLOWS THEM TO CONTROL
THE MARKET AND INSTITUTE PREDATORY PRICING.

NONE OF THE DEFENDANTS' ACTIONS CAN BE JUSTIFIED
UNDER THE UMBRELLA OF EFFICIENCY, AS THE NAMED
DEFENDANTS' SOLE MOTIVATION IS TO THWART THE
POSSIBLE RISE OF EFFECTIVE NEW COMPETITION TO
THE NAMED DEFENDANTS' MONOPOLY IN

NEWSPAPER PUBLISHING

AS FURTHER EVIDENCE IN SUPPORT, THE NAMED DEFENDANTS'
COMPETITORS RANK NEAR THE BOTTOM OF THE LIST.

PLAINTIFF'S JOHN DEMOS & THE SOCIETY OF T.R.U.T.H.
BRING THIS ACTION IN THE CAPACITY OF A PRIVATE
ATTORNEY GENERAL.

Relief

1. I SEEK A JURY TRIAL.

I SEEK \$25 MILLION IN TREBLE, CONTINUING, SPECIAL,
GENERAL, PUNITIVE, PECUNIARY, COMPENSATORY,
STATUTORY, AND DECLARATORY DAMAGES, AND \$15
MILLION IN HEDONIC, ALL PURPOSE, TREBLE, AND
PROSPECTIVE DAMAGES.

CONCLUSION

1. THE PERIOD OF THIS CONSPIRACY HAS BEEN INDEFINITE,
AND FOR AT LEAST 25 YEARS.
2. THE OBJECT OF THE CONSPIRACY IS TO CONTROL THE MARKET,
EFFECTUATE PRICES, AND RESTRAIN TRADE.
3. THE NAMED DEFENDANTS TO ACHIEVE THEIR OBJECTIVE
HAVE ENGAGED IN,
A: COLLUSION,
B: A COMBINATION OR CONSPIRACY, BETWEEN DEFENDANTS,
C: A CONSPIRACY TO MAINTAIN PRICE, FIX PRICES,
D: A RESTRAINT UPON INTERSTATE COMMERCE,
E: A PUBLIC, AND A PRIVATE INJURY,
F: A CONTRACT, COMBINATION, CONSPIRACY, AND
MONOPOLIZATION,
G: A CONCERTED ACTION TO RESTRAIN TRADE, AND
INSTITUTE AN ANTI-COMPETITIVE MARKET,
H: FALSE INFORMATION TO THE MEDIA,
I: ACQUIESCENCE, AND SECRECY,
J: PARALLEL PRICING,
K: A COMBINATION TO EFFECTUATE AN INTERNATIONAL
PRICE FIXING SCHEME,

1st John R. Demore
10/25/2016

THE C.E.O. AND ADDRESS OF THE NAMED DEFENDANTS

1. ADVANCE PUBLICATIONS, INC,
950 FINGERBOARD ROAD - STATEN ISLAND, N.Y. 10305

SAMUEL I. NEWHOUSE JR - C.E.O.

2. GANNETT CORP INC, 7950 JONES BRANCH DRIVE
MCLEAN, VIRGINIA. 22107

GRACIA MARTORE - C.E.O.

3. McCLATCHY CO - 2100 9 STREET - SACRAMENTO, CALIF. 95816
PATRICK J. TAMMANTES - C.E.O.

4. NEW YORK TIMES CO. 620-8TH AVE - N.Y. N.Y. 10018
ARTHUR O. SULZBERGER - C.E.O.

5. TRIBUNE CO, 435 NORTH MICHIGAN AVENUE -
CHICAGO, ILL. 60611 - SAM ZELL - C.E.O.

6. WASHINGTON POST CO - 1150-15TH STREET N.W.
WASH, D.C. 20071 - DONALD E. GRAHAM - C.E.O.

John R. Demps # 287465 R-B-109
WASHINGTON STATE PENITENTIARY
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Walla Walla, Washington 99362